

## REMARKS

Claims 1-12 are pending in the application. Support for currently added Claim 12 is found at page 2, lines 5-8. Applicant respectfully asserts that no new matter has been added and requests reconsideration of the claims currently pending in the application.

On page 2 of the Office Action, in paragraph (2), Claims 1-4 and 8-11 are rejected under 35 U.S.C. 103(a) as being unpatentable over Jagiela 5,566,995. It is submitted that Jagiela does not render obvious Applicant's invention for the following reasons.

1. Jagiela's plate portion is not T-shaped.
2. Jagiela's plate does not have a tang, since a tang is defined as "a piece that forms an extension from the blade or analogous part of an instrument (as a table knife or fork, file, chisel, or sword) and connects with the handle and that may be a thin flat blade on each side of which a rounded piece is secured to form the handle or that may be a tapered piece inserted into the haft or handle." - WEBSTER'S THIRD NEW INTERNATIONAL DICTIONARY, Merriam-Webster Inc., Springfield, Massachusetts, 2002.
3. There is no suggestion in Jagiela to modify the shape of the plate to a T-shape or to provide a tang.

These differences are of such a nature as to make Applicant's burglary prevention device unobvious. The Examiner is therefore urged to give favorable consideration to the patentability of Claims 1-4 and 8-11. Claim 1 is an independent claim and Claims 2-4 and 8-11 depend from Claim 1 and contain the subject matter of Claim 1 as well as additional subject matter.

On page 2, in paragraph (3), Claims 5-7 are rejected under 35 U.S.C. 103(a) as being unpatentable over Jagiela in view of Sushan 4,130,311. Sushan adds nothing to the disclosure of Jagiela which might supply the deficiencies of Jagiela discussed above. Claims 5-7, which depend from Claim 1, are also patentable along with Claims 1-4 and 8-11 for the reasons given above.

With special regard to new Claim 12, neither Jagiela nor the combination of Jagiela with Sushan suggests a T-shaped metal plate having a tang, which is perpendicular to the major portion of the plate and integral therewith.

In view of the foregoing amendments and comments, it is submitted that all the claims now pending in this application are patentable over the cited references. Allowance of Claims 1-12 is earnestly solicited.

Respectfully submitted,

*Michael A. Kondzella*  
Michael A. Kondzella  
Attorney for Applicant